

Exhibit “B”

Affidavit of Winfred Williams, M.D.

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DEBRA JOYCE CLACKLER, #159516,

Plaintiff,

v.

**GLADYS DEESE, FRANK ALBRIGHT
and DR. SAMUEL ENGLEHARDT,**

Defendants.

**CIVIL ACTION NO.
2:06-CV-172-WHA**

AFFIDAVIT OF WINFRED WILLIAMS, M.D.

STATE OF ALABAMA

COUNTY OF MONTGOMERY

Before me, the undersigned Notary Public, personally appeared WINFRED WILLIAMS, M.D. who, after being duly sworn, states as follows:

1. My name is Winfred Williams, M.D. I am over the age of nineteen (19) years and have personal knowledge of the information contained in this affidavit.
2. I am a licensed physician in the state of Alabama. I am currently employed as the Medical Director at Julia Tutwiler Prison for Women ("Tutwiler").
3. Deborah Clackler ("Clackler") is an inmate currently incarcerated at Tutwiler.
4. On or about June 20, 2005, I assumed responsibility for the management of all general medical care for inmates at Tutwiler following the decision of Samuel Englehardt, M.D. ("Dr. Englehardt") to limit his activities at Tutwiler to gynecological and obstetric care.
5. On June 20, 2005, I entered orders for Clackler to have a mammogram. (PHS0087).

6. On June 24, 2005, Dr. Daly performed outpatient surgery on Clackler to remove her lipoma. (PHS0020; PHS0281). The lipoma was successfully removed, and Clackler was prescribed Tylenol for any post-surgical pain and scheduled to have a follow-up evaluation with Dr. Daly in two to three weeks. (Id.).

7. On June 24, 2005, once Clackler returned to Tutwiler after the outpatient surgery to remove her lipoma, I admitted Clackler to the infirmary to be monitored until she recovered from her surgery. (PHS0019). I also entered an order for Clackler to receive Percogesic (which is used to relive pain). (PHS0019; PHS0151).

8. On June 27, 2005, I evaluated Clackler to review the status of her recovery from the surgical removal of her lipoma. (PHS0010; PHS0073). At this time, Clackler indicated that her pain was minimal. (PHS0010). I prescribed Flagyl (which is an antibiotic used to treat bacteria and infections) and scheduled a follow-up appointment for Clackler to be evaluated with Dr. Daly in two weeks. (Id.; PHS0080).

9. Also on June 27, 2005, I scheduled Clackler to have a mammogram. (PHS0080).

10. On June 29, 2005, after Clackler had spent almost a week in the infirmary, she was discharged from the infirmary because the surgical wound resulting from the removal of her lipoma was healing as expected. (PHS0004).

11. On July 1, 2005, Clackler was sent to Elmore Community Hospital to have her scheduled mammogram. (PHS0359). The results of the mammogram indicated that the clusters or masses in Clackler's breasts were benign and non-cancerous. (Id.).

12. On July 13, 2005, Clackler returned to Montgomery Surgical Associates, P.A. for her follow-up visit with Dr. Daly. (PHS0278; PHS0395). Dr. Daly evaluated Clackler and

determined that the surgical wound resulting from the removal of her lipoma was healing nicely, and Clackler could resume normal activities. (Id.).

13. On July 21, 2005, Clackler submitted a sick call request form complaining of bowel obstruction, abdominal pain, low heart rate, weakness and shortness of breath. (PHS0150). At this time, Clackler was scheduled to see a physician. (Id.).

14. On July 25, 2005, I evaluated Clackler and prescribed Colace, Magnesium Citrate, and Milk of Magnesia (which is a laxative used to promote bowel movements). (PHS0086).

15. On July 29, 2005, Clackler again complained of bowel obstruction, pain in her abdomen, inability to have a bowel movement without a laxative, low heart rate and shortness of breath (PHS0149). On August 1, 2005, I entered orders for Clackler to have a KUB (which is an X-ray of kidneys and bladder) to determine the cause of Clackler's pain. (PHS0086).

16. On August 4, 2005, the results of the Clackler's KUB test indicated that there was no evidence of any bowel obstruction or unusual intra-abdominal calcifications. (PHS0358).

17. From August 12 to August 30, 2005, Clackler submitted six sick call request forms complaining of pain in her abdomen, lack of bowel movements absent a laxative, low heart rate and weakness and shortness of breath. (PHS0143; PHS0144; PHS0145; PHS0146; PHS0147; PHS0148). On each occasion, Clackler was evaluated by medical personnel and scheduled to see a physician. (Id.). On September 7, 2005, I entered orders for Clackler to have an EKG (which is used to determine the status and function of the heart), the results of which were later determined to be normal. (PHS0086).

18. On September 8, 2005, Dr. Englehardt prescribed Clackler Phenagren and Provera (which is used to regulate ovulation and menstruation) in order to reduce and/or prevent

Clackler's vaginal bleeding. (PHS0085). On September 24, 2005, Clackler submitted a sick call request form stating that the Provera stopped her vaginal bleeding temporarily, but the bleeding returned after she stopped taking Provera. (PHS0142). At this time, Clackler prescribed Motrin and scheduled to see a physician. (Id.).

19. On October 5 and 21, 2005, Dr. Englehardt evaluated Clackler for complaints of constipation and pain in the right, upper quadrant of her stomach. (PHS0085; PHS0107; PHS0140-0141). At this time, he conducted a thorough physical examination of Clackler, performed a pap smear, extracted a cervical culture and conducted a urine culture and sensitivity test. (Id.). Dr. Englehardt also entered orders for Clackler to receive Milk of Magnesia (PHS0085; PHS0107).

20. On November 3, 2005, I evaluated Clackler for complaints vaginal bleeding, abdominal pain, cramping and swelling in her abdomen and other discomfort related thereto. (PHS0071). I conducted an evaluation of Clackler and determined that her pelvis was normal, noted her abdominal hernia (which may have been causing some of her abdominal pain), ordered a liver function test (the results of which were normal) and ordered a follow evaluation with me to evaluate Clackler's perimenopausal (in the middle of menopause) symptoms. (PHS0085; PHS0106; PHS0305).

21. On November 8, 2005, Dr. Englehardt evaluated Clackler for her complaint of continued vaginal bleeding. (PHS0085; PHS0105). Clackler's vaginal bleeding was the result of her being in the advanced stages of menopause. (Id.). Dr. Englehardt ordered Clackler to receive a pelvic ultrasound, and to have a D&C (scraping of the inner-lining of the uterus). (Id.). Additional, I prescribed Provera to control Clackler's vaginal bleeding. (Id.).

22. On December 1, 2005, Clackler submitted a sick call request form, complaining of abdominal and back pain. (PHS0137). Clackler was scheduled to be evaluated by a physician and undergo her scheduled ultrasound. (Id.). On December 6, 2005, a pelvic ultrasound was conducted on Clackler, which indicated that she had a fibroid uterus (which can cause vaginal bleeding). (PHS0357).

23. On December 25 and 27, 2005, Clackler submitted sick call request forms, complaining of abdominal and back pains, constipation, vomiting and swelling. (PHS0135-0136; PHS0134).

24. On December 30, 2005, Dr. Englehardt conducted an evaluation of Clackler. (PHS0070; PHS0084). She indicated that she had two normal menstrual cycles, indicating that the Provera was working. (Id.). At this time, Dr. Englehardt prescribed Clackler Metamucil in order to promote bowel movements and relieve any problems she may be having with constipation. (Id.).

25. On January 12 and 14, 2006, Clackler submitted a sick call request form complaining of abdominal and back pain, vaginal pain, nausea and vomiting. (PHS0130-0133). On January 18, 2005, Dr. Englehardt evaluated Clackler and continued her prescriptions of Provera and Zantac. (PHS0083).

26. On January 31, 2006, Dr. Englehardt determined that Clackler had an ulcer and prescribed her Dulcolax, Tums and Gas-Ex to relieve her abdominal pain. (PHS0083; PHS0104). On this same day, Clackler tested positive for H. Pylori (an infection in the intestines). (Id.; PHS0304). However, the results of this test were later determined to be a false-positive. A false-positive test result is one that appears to detect a disease or condition when in fact it is not present.

27. On February 2, 2006, Dr. Englehardt evaluated Clackler and prescribed Flagyl and Tetracycline (which is an antibiotic used to fight bacteria and infections). (PHS0083).

28. On February 9 and 11, 2006, Clackler submitted sick call request forms, complaining of abdominal and back pain, swelling, nausea, vomiting and constipation. (PHS0127; PHS0128). At this time, Clackler was given Maalox and Pepto Bismol. (PHS0127; PHS0083).

29. On February 13, 2006, Dr. Englehardt ordered Clackler to continue taking Tetracycline and Flagyl, entered a prescription for Prilosec (which is used to reduce the amount of acid produced by the stomach), educated Clackler concerning her diet and scheduled Clackler to be evaluated by me regarding her ulcer. (PHS0067-0068; PHS0082; PHS0083).

30. On February 14, 2006, I evaluated Clackler, educated her concerning her diet and continued her prescription for Prilosec. (PHS0066; PHS0081).

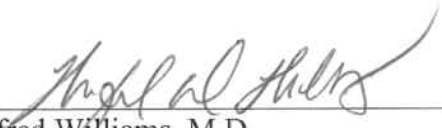
31. On February 22, 2006, March 9, 2006 and March 14, 2006, Clackler submitted sick call request forms complaining of abdominal and back pain and was subsequently evaluated and treated by Dr. Williams. (PHS0120-0125).

32. On March 20, 2006, I ordered Clackler to continue taking Flagyl and other acid suppressing medications. (PHS0081; PHS0103). Additionally, I prescribed Amoxicillin. (Id.).

33. I reacted to Clackler's requests for medical treatment in a timely and appropriate way. I based my decisions regarding Clackler's medical treatment upon my medical judgment at that time. I did not refuse to provide Clackler with medical treatment and I did not ignore any of her complaints.

Further affiant saith not.

[Signature page to follow.]



Winfred Williams, M.D.

SWORN TO and SUBSCRIBED before this the 17 day of May, 2006



Notary Public
My Commission Expires: 8-18-2006

(SEAL)